

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

STEVEN J. PALANGE

C.A NO.1:19-cv-00340-JJM-PAS

*PLAINTIFF*

v.

Michael Forte,  
DEFENDANT.

**Omnibus Motion for Summary Judgement**

I, Steven J. Palange hereby moves this honorable court to grant or award summary judgment in my favor against the defendant Michael B. Forte for illegally, unlawfully influencing the Judgements of RI Family Court case W2012-0361. I have been deprived of my daughter K.P., as she has been deprived of her father, family integrity, and all her Federal and State rights, laws, and due process.

I seek Summary Declaratory Judgement against Michal Forte, Margarita Palange, and Richard Updegrove that the Court finds that the above-named defendants did and continue to engage in a practice and pattern of denying

myself and K.P. to the courts and the procedures of law due to each and every person in the State of Rhode Island and the United States of America.

The exhibits presented to the United States Court of Appeals for the 1st Circuit, the United States District Court for the District of Rhode Island, the Rhode Island Supreme Court and Family Court, present a clear miscarriage of justice and violate the Final Judgement of Divorce protected by Res Juticata and Collateral eStoppel.

I seek Declaratory Judgement for the deprivation of my “family integrity” and for that of K.P. It has been almost 3 years since Michael Forte, Margarita Palange and Richard Updegrove have terminated any and all physical contact with my child by subverting the due administration of justice.

This motion includes an omnibus motion against all defendants that have Motioned this Court to Dismiss this Complaint, for any and all alleged threadbare allegations.

I deny that I am in any way using the Rhode Island Federal Court to relitigate my RI Court cases. I, Steven Palange, Plaintiff wishes to bring to this Court’s

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attention that he, the Plaintiff, Steven J. Palange is not “a loser” in the State courts. My Answer to these allegations that I am using this honorable Federal Court to rehear a case that is currently being litigated in both the RI Family Court and is on appeal before the RI State Supreme Court. Plaintiff moves this Court to order a hearing of the facts as they pertain to violations of Due Process, violations of both State and Federal Constitutions, and for violations of both State and Federal laws.

Plaintiff motions this honorable Court to “Dismiss all Motions” to Dismiss by scheduling a Hearing on the facts as they have been presented, those facts and events below, and those facts shown in Hearing discovery and testimony.

1. There exists a Final Judgment of Divorce.
  2. No Modification or Appeal of the Final Judgement of Divorce has ever been made.
  3. There is a contractual agreement between Plaintiff and Defendant Margarita Palange dated 12-18-13 with the MSA being an attached “Exhibit 1” by Judge Capineiri.
  4. Defendant Michael Forte in conspiracy with Richard Updegrove and Margarita Palange has denied Steven Palange of all procedures entitled to
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every individual under the law. Plaintiff's Due Process of Law has been and will continue to be denied in all RI Courts, including the RI Family Court, RI Superior Court, RI Supreme Court, and throughout the RI Judiciary.

5. Michael Forte has unlawfully influenced RI Family Court case W2012-0361 "Palange v. Palange". Defendant Michael Forte in conspiracy with Richard Updegrove and Margarita Palange has denied me the due process of law, and are in Violation of a legally valid Marriage Settlement Agreement attached as an exhibit to the Final Judgement of Divorce dated 12-18-2013 adjudicated by honorable Judge Capinieri.
  6. Michael Forte has conspired to deprive me of my Federal, Constitutional, and State rights.
  7. Michale Forte has engaged in a pattern of discrimination against me as a male within a Federally Funded Program, specifically Title IV Section D.
  8. Defendant Michael Forte in conspiracy with Richard Updegrove and Margarita Palange, are in violation of the "Best Interest of the Child". This violates all stare decisis precedent outlined in the "Pettinato Best Interest of the Child Principles".
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9. On or around May 9th, 2018 Michael Forte, Margarita Palange, and Richard Updegrove created a false judgment that violated the final judgment of divorce.
10. And as of December 31st, 2020 it has been 995 days since I've seen my daughter in person. Michael Forte, Margarita Palange, Richard Updegrove caused the termination of any and all supervised visitation, custody, placement, control, and family integrity. It's been almost 1,000 days since I've had any visitation or physical contact with my daughter K.P..
11. K.P. has been denied not only a father, but family integrity, and stripped of all her own Constitutional and Federal rights.

The Declaratory Relief I seek in this Motion is a Judgement from this Court that K.P. was unlawfully taken from her family environment and vice-versa. I seek the Declaration that both my and my daughter K.P. Federal, State, Constitutional rights have been violated and deprived.

Respectfully submitted,



Steven J. Palange

By himself Pro Se,

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PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY OF ALL  
ISSUES SO TRIABLE.

**CERTIFICATION OF SERVICE**

I hereby certify that on the 31 st day of December 2020 I emailed a copy of this document to Justin J. Sullivan [jjisullivan@riag.ri.gov](mailto:jjisullivan@riag.ri.gov) and to all other lawyers via Rhode Island Federal District Court ECF.

  
Steven J. Palange, Pro Se